

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas

ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

Defendants.

NO. 2:21-CV-00022-Z

Date: June 27, 2022

DEFENDANT PLANNED PARENTHOOD FEDERATION OF AMERICA, INC.’S
NOTICE OF JOINDER IN THE AFFILIATE DEFENDANTS’ MOTION TO COMPEL

Defendant Planned Parenthood Federation of America, Inc. (“PPFA”) hereby joins in the Motion to Compel [DE 106] (“Motion”) filed by Defendants Planned Parenthood Gulf Coast, Inc.; Planned Parenthood of Greater Texas, Inc.; Planned Parenthood South Texas, Inc.; Planned Parenthood Cameron County, Inc.; and Planned Parenthood San Antonio, Inc. (collectively, “Affiliate Defendants”).

PPFA incorporates herein the arguments set forth by the Affiliate Defendants in the Motion, as each of those arguments applies equally to PPFA.

PPFA remains committed to working with the U.S. Department of Health and Human Services (“HHS”) on a reasonable production schedule and joins in the Motion given the narrow window for discovery and the few documents produced by HHS to date. HHS’s need for more time to comply with the subpoena is a critical factor that strongly supports Defendants’ concurrently-filed motion to modestly extend the schedule. As detailed in that motion, the existing schedule simply does not provide a feasible amount of time for the parties and all third parties to identify relevant custodians; to review, log, and produce documents; and then to take depositions and prepare expert disclosures based on those documents. PPFA is committed to all good faith efforts to complete its production in response to Plaintiffs’ initial requests by August 1, 2022. The Court should grant a modest extension of the schedule and order HHS to likewise promptly complete its production.

For the reasons explained in the Motion, PPFA respectfully requests that the Court grant the Motion and order HHS to produce all documents responsive to the subpoena.

Dated: June 27, 2022

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/s/ Danny S. Ashby
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*Attorneys for Defendant Planned Parenthood
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CERTIFICATE OF SERVICE

I certify that on June 27, 2022, the foregoing *Defendant Planned Parenthood Federation of America, Inc.'s Notice of Joinder in the Affiliate Defendants' Motion to Compel* was filed via the Court's CM/ECF system and, therefore, was served electronically on all counsel of record.

/s/ Danny S. Ashby
Danny S. Ashby